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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

VERIFIED STATEMENT OF STEVENS & LEE, P.C. PURSUANT TO RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Stevens & Lee, P.C. ("S&L") submits this verified statement in accordance with Rule 2019(a) of the Federal Rules of Bankruptcy Procedure.

1. S&L appears in these cases on behalf of the creditors and parties-in-interest listed below (collectively, the "Entities"):

Royal Bank America 732 Montgomery Avenue Narberth, PA 19072

1301 Properties Owner, LP c/o Paramount Group, Inc. 1301 Avenue of the Americas New York, NY 10019

2. The Entities have claims against and/or interests in one or more of the abovecaptioned debtors (the "Debtors") and are parties to certain prepetition agreements with one or more of the Debtors that are impacted by these bankruptcy proceedings. Royal Bank America is a party to an ISDA Master Agreement with Lehman Brothers Special Financial, Inc., as more fully described in the Complaint in the adversary proceeding styled *Royal Bank America v*. *Lehman Brothers Special Financing, Inc.*, Adv. Pro. No. 08-01640. 1301 Properties Owner, LP is a counter-party to a non-residential real property lease with the Debtor Lehman Brothers Holdings Inc. ("LBHI"), and landlord to additional space subleased and sub-subleased to LBHI, as more fully described in the Supplemental Objection and Reservation of Rights of 1301 Properties Owner, LP to Debtors' Proposed Amounts Necessary to Cure Defaults Under Lease (Docket No. 867).

- 3. S&L reserves the right to supplement this statement at any time in the future.
- 4. Each of the Entities has separately retained S&L to represent their interests in connection with the above-captioned cases.
- 5. Upon information and belief formed after due inquiry, S&L does not hold any claims against or equity interests in any of the Debtors.
- 6. S&L makes this Verified Statement solely for disclosure purposes pursuant to Rule 2019, and nothing herein is, or should be construed as, an admission, acknowledgment, or waiver by the Entities.

7. The undersigned hereby verifies under oath that this Verified Statement is true and accurate, to the best of the undersigned's knowledge, information and belief.

Dated: New York, New York November 5, 2008

STEVENS & LEE, P.C.

By: /s/ Alec P. Ostrow
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